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December 23, 2024


Via ECF

Hon. Jennifer L. Rochon
United States District Court Judge
Southern District of New York
500 Pearl Street, Room 1920
New York, N.Y. 10007

Request GRANTED. Defendant shall file its reply or otherwise respond to the Complaint no later than February 3, 2025. The IPTC shall be adjourned to February 13, 2025, at 3:00 p.m.

DATED: December 26, 2024
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

Re: *Andy Ryan Photography, LLC v. Dagny's Real Estate LLC*,
24 Civ. 07787 (JLR)

Dear Judge Rochon:

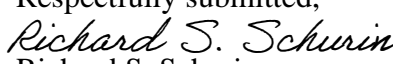
This firm represents Defendant Dagny's Real Estate, LLC (hereinafter "Dagny's").

We write pursuant to Rule 1 F. of Your Honor's Individual Rules for two purposes: (1) to request a second thirty (30) day extension to respond to Plaintiff's Complaint up to and including February 3, 2025; and (2) to request an adjournment of the upcoming initial conference currently scheduled for January 23, 2025. Dagny's requests an adjournment of same until after February 3, 2025. We have discussed these requests with Plaintiff's counsel, and they consent.

Good cause exists for the above requests. In preparing to respond to the Complaint, Dagny's identified issues which may warrant a motion to dismiss under FRCP 12(b)(6) and/or for a more definite statement under FRCP 12(e). In the interest of efficiency, we would prefer to try to resolve these before involving the Court. To that end, we have identified the issues of concern to Plaintiff's counsel and intend to meet and confer to try to resolve them.

The response to the Complaint is now due on January 2, 2025. See Dkt. 15. This is Dagny's second request for an extension. No previous adjournment of the initial conference has been requested. As indicated above, Plaintiff's counsel has consented to these requests.

Pursuant to the above, Dagny's respectfully requests that its Complaint response date be re-set for February 3, 2025, and that the initial conference now set for January 23, 2025, be adjourned for a date of the Court's choosing after February 3, 2025.

Respectfully submitted,

Richard S. Schurin
Counsel for Defendant